



October 5, 2020

Via ECF

The Honorable Sydney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

U.S. v. Evelin Jimenez, 18 Cr. 879 (SHS)
Consent Request for Adjournment of Sentencing Hearing
Due to Pandemic Related Scheduling Issues

Honorable Judge Stein:

We write with the consent of the Government to respectfully request an adjournment of Ms. Jimenez's sentencing hearing, currently scheduled for November 4, 2020, at 3:30 pm, to a date convenient to the Court in late February or early March of 2021. Ms. Jimenez remains at liberty on bond and she has been fully compliant with all of her bail conditions since her arrest on this matter on November 14, 2018.

Numerous issues remain outstanding regarding Ms. Jimenez's sentencing hearing. For my part, concerns of susceptibility to Covid-19 forced the undersigned to quarantine outside the United States for over 6 months until recently, and accordingly the undersigned has been unable to personally meet with Ms. Jimenez nor with family members in order to conduct critical meetings and interviews, in preparation for Ms. Jimenez's sentencing hearing. The pandemic continues to require social distancing, and we hope that these requirements will be relaxed or that a vaccine is developed that will allow for these meetings to take place in person in the near future, also in order to prepare a comprehensive sentencing memorandum for the Court. Should social distancing continue to be a mandate for our continued health, we will explore conducting meetings via video-conference if necessary. We also will need the adjournment in order to continue gathering character letters and other documents on Ms. Jimenez's behalf in preparation for her sentencing. Finally, we remain concerned as to health and safety issues related to the pandemic and although the defense prefers an in-Court, in-person sentencing hearing, the defense does not wish to appear at an in-person hearing during this perilous time. Accordingly, for all of these reasons, we respectfully request that the Court adjourn Ms. Jimenez's sentencing hearing to any date in late February or early March 2021, that is convenient to this Court. With respect to the Pre-sentence Report ("PSR"), any objections to the PSR are due on or about October 12, 2020. We request that the objections and disclosure deadlines be moved to 14 and 7 days prior to the new sentencing date as per Federal Rule of Criminal Procedure 32(f) and (g), respectively.

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We thank the Court in advance for its consideration of this matter.

Respectfully,

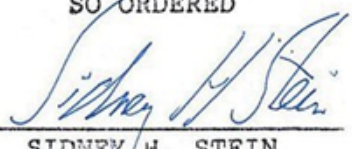
Judith Vargas

Judith Vargas, Esq.

**The sentencing is adjourned to January 27, 2020, at 2:30 p.m.
Defense submissions are due by January 6, the government
submissions are due by January 13.**

**The Court is confident that Ms. Vargas will be able to prepare
for this sentencing via videoconference, teleconference, and
appropriate socially distanced in-person meetings.**

Dated: New York, New York
October 6, 2020

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.